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 10 SEIU, United Healthcare Workers – West

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19 Attorneys for Plaintiff
 20 Shamaneen Khan

21 UNITED STATES DISTRICT COURT
 22 NORTHERN DISTRICT OF CALIFORNIA

23 SHAMANEEN KHAN

24 Plaintiff,

25 v.

26 THE PERMANENTE MEDICAL GROUP,
 27 INCORPORATED, a California Corporation;
 28 SEIU UNITED HELATHCARE WORKERS --
 WEST, a California Corporation and DOES 1-
 50, INCLUSIVE,

Defendants.

) No. C08-01783 WHA

) **STIPULATION AND [PROPOSED]**
) **ORDER CHANGING THE HEARING**
) **DATE FOR DEFENDANT'S SEIU,**
) **UNITED HEALTHCARE WORKERS –**
) **WEST'S MOTION TO DISMISS AND**
) **SETTING BRIEFING SCHEDULE**

) **[FED.R.CIV.PROC. 12 (B)(6)]**

29 Counsel for the Parties, by and through their respective counsel of record, hereby stipulate
 30 and agree as follows:

31 WHEREAS, on or about March 7, 2008, Plaintiff filed a Complaint for Damages Based on
 32 Religious Discrimination, (Failure to Accommodate), Wrongful Termination in Violation of Public

1 Policy and Infliction of Emotional Distress against Defendants in the Superior Court of the State of
2 California, for the County of Alameda, Case No. HG08375316;

3 WHEREAS, on or about April 3, 2008, Defendant SEIU, United Healthcare Workers –
4 West (“UHW”) filed a Notice of Removal;

5 WHEREAS, on or about April 8, 2008, Defendant UHW filed a Motion to Dismiss under
6 Rule 12(b)(6) of the Federal Rules of Civil Procedure, which is set to be heard on May 29, 2008 at
7 8 a.m. before the Honorable William H. Alsup;

8 WHEREAS, on or about May 5, 2008, Plaintiff filed a Notice of Motion and Motion for
9 Remand and Opposition to Defendant UHW’s Motion to Dismiss;

10 WHEREAS, Plaintiff’s Motion for Remand is currently scheduled for June 19, 2008 at 8
11 a.m. before the Honorable William H. Alsup;

12 WHEREAS, it best serves the interests of judicial economy to establish a coordinated
13 briefing schedule and common hearing date for UHW’s Motion to Dismiss and Plaintiff’s Motion
14 for Remand;

15 NOW, THEREFORE, the parties hereby stipulate and agree as follows:

16 1. The hearing on UHW’s Motion to Dismiss currently scheduled for hearing on May
17 29, 2008, and Plaintiff’s Motion for Remand is hereby continued to **June 19, 2008**.

18 2. UHW shall file a combined Reply in support of its Motion to Dismiss and
19 Opposition to Motion for Remand on or before **May 29, 2008**.

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3. Plaintiff shall file a Reply in support of its Motion for Remand on or before **June 5, 2008**.

Dated: May 8, 2008

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

By: Bruce A. Harland
WILLIAM A. SOKOL
BRUCE A. HARLAND
Attorneys for Defendant
SEIU, United Healthcare Workers – West
FRANKLIN EMPLOYMENT LAW GROUP

Dated: May __, 2008

By: _____
EUGENE T. FRANKLIN
BARBARA F. GREEN
Attorneys for Plaintiff
Shamaneen Khan

Dated: May 8, 2008

By: Patrick M. Glenn
HANSON, BRIDGETT, LLP
PATRICK M. GLENN
Attorneys for Defendant
The Permanente Medical Group

Pursuant to the Stipulation of the Parties, and GOOD CAUSE, appearing, IT IS SO
ORDERED.

Dated: May __, 2008

By: _____
HON. WILLIAM H. ALSUP
UNITED STATES DISTRICT JUDGE

3. Plaintiff shall file a Reply in support of its Motion for Remand on or before **June 5, 2008**.

Dated: May 8, 2008

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

By:

WILLIAM A. SOKOL
BRUCE A. HARLAND
Attorneys for Defendant
SEIU, United Healthcare Workers – West
FRANKLIN EMPLOYMENT LAW GROUP

Dated: May 8, 2008

By:

EUGENE T. FRANKLIN
BARBARA F. GREEN
Attorneys for Plaintiff
Shamaneen Khan

Dated: May __, 2008

HANSON, BRIDGETT, LLP

By:

PATRICK M. GLENN
Attorneys for Defendant
The Permanente Medical Group

Pursuant to the Stipulation of the Parties, and GOOD CAUSE, appearing, IT IS SO
ORDERED.

Dated: May __, 2008

By:

HON. WILLIAM H. ALSUP
UNITED STATES DISTRICT JUDGE